

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION**

|                                  |   |                              |
|----------------------------------|---|------------------------------|
| <b>STATE OF ARIZONA, et al.,</b> | ) |                              |
|                                  | ) |                              |
| <b>Plaintiffs,</b>               | ) |                              |
|                                  | ) |                              |
| <b>v.</b>                        | ) | <b>Case No. 6:22-cv-1130</b> |
|                                  | ) |                              |
| <b>MERRICK GARLAND, et al.,</b>  | ) |                              |
|                                  | ) |                              |
| <b>Defendants.</b>               | ) |                              |
|                                  | ) |                              |

**MOTION FOR EXTENSION OF TIME  
TO PRODUCE REMAINING DISCOVERY**

Defendants respectfully request an extension of time, from July 28 to August 11, 2023 to produce the remaining court ordered discovery (ECF Nos. 170, 178), and a corresponding adjournment of the August 11, 2023 deadline to exchange expert reports (ECF No. 178), and the September 1, 2023 deadline for Defendants to file a Rule 12 motion (ECF No. 170). Plaintiffs take no position on this request.

By way of background, the parties attended a conference on May 24, 2023 to discuss their respective motions to compel and outstanding discovery. ECF No. 170. Following that conference, the Court granted in part and denied in part both motions, and directed the parties to confer about a protective order and propose a joint schedule for the necessary productions, which was endorsed by the Court on June 22, 2023. *Id.*; ECF No. 178. The Court also deferred ruling on Plaintiffs' Request For Production ("RFP") 11, and directed the parties to confer on the scope of that request. ECF No. 170. The Court endorsed the parties' protective order on June 26, 2023, ECF No. 181, and Defendants provided Plaintiffs with the identifying information ordered by the Court on June

30, 2023. Using that information Defendants provided, Plaintiffs made a production to Defendants pursuant to the Court's order on July 27, 2023. ECF No. 170.<sup>1</sup>

The parties have been emailing regarding the scope and relevance of RFP 11 throughout the month of July, but have not yet come to an agreement on all the subparts contained within that request. These ongoing discussions delayed Defendants' ability to run the necessary data searches until more of an agreement was reached between the parties. While the parties have not reached complete agreement on RFP 11, there is enough consensus that Defendants were able to start pulling the responsive data. However, this brief extension of time is necessary to finish pulling and reviewing that data. This brief extension also allows the parties additional time to confer on RFP 11, and once an agreement is reached, allows Defendants time to pull the remaining agreed-upon responsive data.

Therefore, Defendants request that the Court grant an extension of time, from July 28 to August 11, 2023, for the parties to finish their discussion on the scope of RFP 11 and Defendants to thereafter produce the remaining court ordered discovery, and a corresponding adjournment of the August 11 and September 1, 2023 deadlines.

Date: July 28, 2023

Respectfully submitted,

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*Principal Deputy Assistant Attorney General*

WILLIAM C. PEACHEY  
*Director*  
Office of Immigration Litigation  
District Court Section

EREZ REUVENI  
*Assistant Director*

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<sup>1</sup> Defendants are still reviewing that production and cannot yet speak to its completeness. Should Defendants believe there are any deficiencies, they will of course raise it with Plaintiffs first before seeking any Court intervention.

BRIAN C. WARD  
*Senior Litigation Counsel*

/s/ Erin T. Ryan  
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*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 28, 2023, I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which provided an electronic notice and electronic link of the same to all attorneys of record.

By: /s/ Erin T. Ryan

ERIN T. RYAN

Trial Attorney

United States Department of Justice

Civil Division